

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

PIONEER SERVICES, INC.,)	
)	
PLAINTIFF,)	
)	
V.)	2:06cv377-WKW
)	
AUTO-OWNERS INSURANCE COMPANY,)	
INC., et al,)	
)	
DEFENDANTS.)	

**PLAINTIFF'S MOTION TO EXTENSION OF TIME TO FILE
RESPONSE TO MOTION FOR SUMMARY JUDGMENT**

Comes now the Plaintiff, through counsel, and hereby moves this Court to extend for one week the Plaintiff's deadline to respond to the Defendant's Motion for Summary Judgment. In support, the Plaintiff states as follows:

1. On March 27, 2007 this Court issued an order setting a deadline of April 17, 2007 for the Plaintiff to file its response to Defendant's Motion for Summary Judgment. (Doc. No. 20).

2. On March 15, 2007, however, this Court extended the discovery cutoff to April 30, 2007 in order to allow both parties to complete depositions of the expert witnesses. (Doc. No. 17).

3. The parties at this time have scheduled and commenced the depositions of experts. On April 11, 2007 the parties completed the deposition of Plaintiff's expert Don Dinsmore. The Plaintiff has been informed that the transcript of Mr. Dinsmore's deposition will not be completed in time to allow Plaintiff to use it in its response to summary judgment briefs. This deposition will be important to a fair adjudication of

the case and will aid the Court in the resolution of the summary judgment issues. Mr. Dinsmore's testimony directly addressed the issues in the Motion for Summary Judgment. Further, a one week extension of time for plaintiff to respond will not prejudice any party herein.

4. The undersigned has attempted to resolve this dispute with defense counsel, but to date has been unable to do so and Defendant has not agreed to this motion. Therefore, the plaintiff requests a ruling in its favor.

WHEREFORE, the Plaintiff prays that this Court extend Plaintiff's time to respond to the Defendant's Motion for Summary Judgment from April 17, 2007 to April 24, 2007.

Respectfully submitted,

s/ Harry P. Hall, II
Harry P. Hall, II (HAL053)
Attorney for Plaintiff

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of the foregoing upon the following individual(s) by electronic means or by U.S. Mail postage prepaid and properly addressed on this the 11th day of April, 2007.

Joel H. Pearson
P.O. Box 4804
Montgomery, Alabama 36103-44804

s/ Harry P. Hall, II
Of Counsel